

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS	§	CAUSE NO. SA-23-CR-00499(6)OLG
	§	
JONATHAN ADAMS	§	

UNOPPOSED MOTION TO AMEND CONDITIONS OF PRE-TRIAL RELEASE

TO THE HONORABLE ORLANDO GARCIA, UNITED STATES DISTRICT JUDGE,
WESTERN DISTRICT OF TEXAS, SAN ANTONIO DIVISION:

Pursuant to 18 U.S.C. § 3145(a)(2), Defendant Jonathan Adams respectfully files this Motion to Amend the Conditions of Release to allow travel throughout the United States during the pendency of his case and shows this Honorable Court as follows:

I.

Mr. Adams was arrested in the Northern District of Georgia, Atlanta Division. He was released on a \$10,000 unsecured bond in this case. An Order setting Conditions was rendered on September 26, 2023. *See* Docket No. 55. A condition of Mr. Adams' release requires him to remain within the Northern District of Georgia and the Western District of Texas. *See id.* at (7)(t).

II.

Shortly after his arrest, Mr. Adams was laid off. He has been actively seeking employment and was recently offered an apprenticeship with Boilermakers Local Lodge 045. In order to accept this apprenticeship, Mr. Adams is required to travel to North Chesterfield, Virginia on January 15, 2024, to attend orientation on January 16, 2024. Mr. Adams will be required to travel throughout the United States once employed.

In addition to traveling for employment, Mr. Adams' mother recently passed away. Mr. Adams requests the ability to travel to/from his mother's home in Alabama once per month to finalize arrangements with the home.

Defendant has no criminal history and has not had any violations in the few months he has been on Pretrial Release and has complied with all other conditions of release.

III.

Mr. Adams is currently being courtesy supervised by the Northern District of Georgia, Atlanta Division. Pretrial Services Officer Abnel Torres is unopposed to this request but asked that the defense file a motion with the Court.

WHEREFORE, PREMISES CONSIDERED, Defendant requests the Court amend the conditions of Defendant's Pre-Trial Release and remove Condition (t) of the Additional Conditions of Release requiring Defendant to remain in the Northern District of Georgia and Western District of Texas.

Respectfully Submitted,

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BY: /s/ Michael D. Bernard
Michael D. Bernard
State Bar No. 02211310

ATTORNEY FOR DEFENDANT,
JONATHAN ADAMS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing motion was filed with the Clerk of the Court by the ECF System and was delivered to AUSA Daphne Newaz, U.S. Attorney's Office, 611 N.W. Loop 410, Suite 600, San Antonio, Texas 78216.

_____/s/_____
Michael D. Bernard

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ORDER AMENDING CONDITIONS OF PRETRIAL RELEASE

On this date came to be considered defendant's Motion to Modify Condition (t) of the Additional Conditions of Release of the Court's Order Setting Conditions of Release of Defendant requiring Defendant to remain in the Northern District of Georgia and Western District of Texas, and after reviewing the same Said Motion is hereby GRANTED.

It is hereby Ordered that condition (t) of the Additional Conditions of Release requiring Defendant to remain within the Northern District of Georgia and Western District of Texas is removed. Defendant is permitted to travel throughout the United States for employment purposes and to travel to/from his mother's home in Alabama. Defendant will remain in contact with his Pretrial Services Officer as necessary. All other conditions of pre-trial release remain in effect.

SIGNED and ORDERED on this the ____ day of January 2024.

Hon. Orlando Garcia
U.S. District Judge